

**quinn emanuel trial lawyers | new york**

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.  
**(212) 849-7551**

WRITER'S INTERNET ADDRESS  
**andrewdunlap@quinnemanuel.com**

May 14, 2014

**VIA ECF**

The Honorable Denise L. Cote  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1610  
New York, NY 10007-1312

Re: FHFA v. HSBC North America Holdings, Inc., et al., No. 11-CV-6189 (S.D.N.Y.); FHFA v. Goldman Sachs & Co., et al., No. 11-CV-6198 (S.D.N.Y.); FHFA v. Nomura Holding America, Inc., et al., No. 11-CV-6201 (S.D.N.Y.)

Dear Judge Cote:

I write regarding the Court's May 9, 2014 Order in the above-captioned cases, approving HSBC's request to redact Exhibit 19 to my declaration submitted in support of FHFA's motion for partial summary judgment in these three actions (No. 11-CV-6189 Dkt. No. 696; No. 11-CV-6198 Dkt. No. 696; No. 11-CV-6201 Dkt. No. 663). In its May 9 Order, the Court ordered FHFA to "refile a redacted version of Exhibit 19 in the public dockets" of each action.<sup>1</sup> In attempting to do, our firm was told by the Southern District of New York's ECF Help Desk and Quality Assurance departments that for FHFA to refile Exhibit 19 it should refile my entire declaration—which contains 247 Exhibits that, for purposes of electronic filing, must be broken into 812 separate pieces—in all three actions. To avoid this administrative burden, FHFA respectfully requests that the Court order a redacted version of Exhibit 19, attached, be filed on the public docket in the above-captioned cases. FHFA will file the unredacted version of Exhibit 19 with the Southern District of New York's Records Management Unit.

---

<sup>1</sup> Although the Court's order made reference to "four" actions, Exhibit 19 to my declaration was only filed in the three above-captioned cases.

FHFA has conferred with the defendants in the above-captioned actions, which do not object to this request.

Respectfully submitted,

/s/ Andrew R. Dunlap

Andrew R. Dunlap

Enclosures

cc: All counsel of record (via ECF)